

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

v.

WALMART INC. AND WAL-MART  
STORES EAST, LP,

Defendants.

)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)

C.A. No. 20-1744-CFC

**MOTION FOR TELECONFERENCE TO RESOLVE  
DISCOVERY DISPUTE**

Plaintiff the United States respectfully moves this Court to schedule a teleconference to address an outstanding dispute regarding the following discovery matters:

1. The United States' request that defendants Walmart Inc. and Wal-Mart Stores East, LP (collectively, "Walmart") produce in response to Requests for Production Nos. 1 and 2 data reflecting the controlled substance prescriptions Walmart dispensed nationwide and all of the electronic data fields associated with those records, as well as the data and associated fields for certain non-controlled substances where Walmart dispensed a controlled substance prescription within 60 days of dispensing the non-controlled substance.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer (by telephone) on the following dates: December 4, 2020 (100 minutes); December 18, 2025 (100 minutes); January 10, 2025 (80 minutes); and January 22 (75 minutes).

Plaintiff's Counsel:

Delaware Counsel: Elizabeth Vieyra

Lead Counsel: Katherine Ho, Kate Brunson, Kimberly Stephens

Defendant's Counsel:

Delaware Counsel: Kelly Farnan

Lead Counsel: Jason Varnado, Billy Laxton, James Carlson, Andrew Junker (all but December 18) and William Leathers

The parties are available for a teleconference on the following dates: February 20, 24, or 26.

This dispute is the fourth time that a discovery or protective order dispute has been brought before the Court.

Respectfully submitted,

SHANNON T. HANSON  
Acting United States Attorney

/s/ Elizabeth F. Vieyra

Dylan Steinberg  
Elizabeth F. Vieyra  
Assistant United States Attorneys  
1313 N. Market Street  
Wilmington, DE 19899-2046  
(302) 573-6277  
dylan.steinberg@usdoj.gov  
elizabeth.vieyra@usdoj.gov

*Counsel for Plaintiff  
United States of America*

Dated: January 31, 2025